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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) CASE NO. CR 11-00472 RMW
15 Plaintiff,)
16 v.)
17 KEVEN CHEN CHIEH YANG,)
Defendant.)
18 _____)

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20 The United States respectfully requests this Court accept the agreement of the parties entered
21 pursuant to Rule 11(c)(1)(C). The government agrees with the Sentencing Guidelines calculation and
22 criminal history computation of the Probation Office. The government requests that restitution be
23 entered consistent with the Presentence Report. The agreed upon sentence represents a five month
24 downward variance from the advisory range of 41-51 months. The variance is justified under 18 U.S.C.
25 § 3553(a), including the defendant's acceptance of responsibility, his agreement to pay
26 restitution and make the victims whole, the defendant's criminal history, and in light of the risks and
27 resources associated with trial in this matter.

1 For the foregoing reasons, we asked the court to accept the plea agreement and sentence the
2 defendant consistent with the terms of the negotiated disposition.

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4 DATED: December 20, 2013

Respectfully submitted,
5 MELINDA HAAG
United States Attorney

6
7 /s/
8 DANIEL KALEBA
9 Assistant United States Attorney
EDWARD FLUET
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